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May 1, 2025

VIA ECF

The Honorable Analisa Torres
United States District Court
Southern District of New York
United States District Courthouse
500 Pearl Street
New York, NY 10007

Re: Estate of Tamar Kedem Siman Tov, et al. v. UNRWA, et al.
24 Civ. 4765 (AT): Response to Government's Letter

Dear Judge Torres:

We write on behalf of the Defendants United Nations Relief and Works Agency for Palestine Refugees in the Near East ("UNRWA"), Philippe Lazzarini, Pierre Krähenbühl, Filippo Grandi, Leni Stenseth, Sandra Mitchell, Margot Ellis, and Greta Gunnarsdottir (collectively, "Defendants"), to request leave to respond to the U.S. Government's letter dated April 24, 2025 [ECF No. 59]. This letter marks a reversal of the Government's positions set forth in two prior submissions to the Court [ECF Nos. 17 and 38] and raises several new arguments concerning Defendants' jurisdictional immunity. The Court has previously granted Plaintiffs the opportunity to respond to the U.S. Government's prior submissions. [ECF Nos. 19 and 41]. Thus, without prejudice to Defendants' assertion of immunity and their position that this case should be immediately dismissed, Defendants respectfully request the opportunity to respond to the Government's latest submission by May 22, 2025. We have conferred with Plaintiffs' counsel, and Plaintiffs confirmed that they do not object to Defendants' request.

Defendants reserve all rights, defenses, privileges and immunities and waive none. For the avoidance of doubt, neither this letter nor the appearance of defense counsel should be construed as a waiver of any kind.

GRANTED.

SO ORDERED.

Dated: May 2, 2025
New York, New York



ANALISA TORRES
United States District Judge